

# **EXHIBIT AE**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
Case No. 03-MDL-1570 (GBD) (SN)

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IN RE: TERRORIST ATTACKS ON  
  
SEPTEMBER 11, 2001

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REMOTE VIDEOTAPED DEPOSITION OF  
VICTOR COMRAS  
Ft. Lauderdale, Florida  
July 23, 2021

Reported By:  
ERIC J. FINZ

1 VICTOR COMRAS

2 situation is that these are unexplained.  
3 If there is an explanation, please  
4 provide it. That's your job, not mine.

5 Q. On page 50 of your main  
6 report. I will pause for you to get  
7 there.

8 A. Thank you. Okay.

9 Q. You discuss the el-Eman, e-l,  
10 new word, E-m-a-n, dormitory project for  
11 which Kadi arranged Julaidan to arrange  
12 construction. Correct?

13 A. Correct.

14 Q. And you conclude that  
15 between -- and this is a quote, between  
16 926,000 and 1.28 million of the  
17 Kadi/Karavan, Karavan with a K, provided  
18 funding for this transaction remained  
19 unaccounted for and was likely skimmed  
20 off for our purposes including Al Qaeda,  
21 close quote.

22 Did I read that correctly?

23 A. You did.

24 Q. And then if you could turn to  
25 page 33 of your main report.

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2 A. Sorry, which page?

3 Q. 33. 3-3.

4 A. Got it.

5 Q. Second full paragraph. This  
6 is not a run-over paragraph, so it's also  
7 the second paragraph.

8 A. Okay.

9 Q. And the last sentence of that  
10 paragraph is, "These suspicions were  
11 exacerbated by a subsequent accounting  
12 indicating that up to 300,000 of these  
13 funds remain unaccounted for." Second to  
14 last sentence.

15 A. Okay and?

16 Q. You say "more about this Maram  
17 project below."

18 Do you not see a discrepancy  
19 between 300,926 to 1.28 million?

20 A. I think you're comparing  
21 apples and oranges. I'm saying that a  
22 certain amount of money unaccounted for  
23 in a sense that we don't -- skimmed off,  
24 what happened to it. It did not  
25 logically or clearly go for the projects

VICTOR COMRAS

concerned. The 300,000 comes from a report that was done, I think, by the Swiss or the Germans, I'm not sure. The Swiss police, I think. That they said that 300,000 in the accounting was unaccountable.

Money, again, is fungible. You can find a purpose for the funds. But the funds' purpose may be somewhat off of the project that you're talking about. May have even been replaced by other funds. May involve other transactions.

So when I looked at it, it seemed to me that there was a real risk or great amount of this money could have been skimmed off.

Other sources also paid for some of the projects that were ordered by those involved, by Julaidan and others.

So I don't see a discrepancy between the figures, no. I just see that they're involving two different accountings by two different groups for

1 VICTOR COMRAS

2 two different purposes.

3 Q. You used the phrase  
4 "unaccounted for" in reference to both  
5 sets of figures. Correct?

6 A. Correct. Unaccounted for for  
7 me may mean a different thing than  
8 unaccounted for for the Swiss police.  
9 And I was simply referring to the Swiss  
10 police. I think it was the Swiss police  
11 report.

12 Q. And you're sticking with the  
13 926,000 to \$1.28 million range as funds  
14 that were never accounted for that you  
15 claim may have been skimmed off?

16 A. I said that were inefficiently  
17 or insufficiently accounted for. And may  
18 have been skimmed off, would be a more  
19 correct perhaps statement.

20 Q. How did you calculate those  
21 figures, by the way?

22 A. I calculated them at the time  
23 I created the report. I would spend some  
24 time recreating that calculation. And I  
25 don't think we have that within the hour

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2 that's left.

3 Q. No, we don't.

4 As you sit here today then,  
5 just to be clear, you can't account for  
6 yourself how you get to the figures of  
7 \$926,000 to \$1.28 million as being  
8 unaccounted for; can you?

9 MR. MALONEY: Objection.

10 That's not what he said.

11 Mischaracterizes his testimony.

12 A. I believe that I can stand by  
13 my statement. And if required, I can do  
14 so. I can put it back together again and  
15 provide a decent rationale for that  
16 statement, yes.

17 Q. Can you --

18 A. I don't think I'm in a  
19 position do that standing here on Zoom,  
20 no, in this deposition.

21 Q. We agree. But maybe perhaps  
22 you do remember the methodology you used  
23 to calculate those figures?

24 A. The methodology is, again, the  
25 fungibility of money. I noted when I

VICTOR COMRAS

STATE OF Virginia )

ss:

COUNTY OF Falls Church )

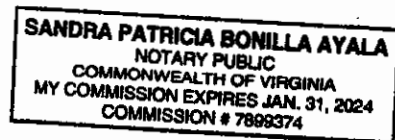
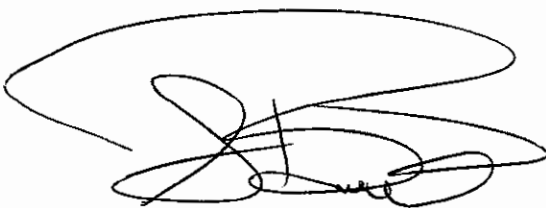
I, VICTOR COMRAS, the witness  
herein, having read the foregoing  
testimony of the pages of this  
deposition, do hereby certify it to be a  
true and correct transcript, subject to  
the corrections, if any, shown on the  
attached page.



VICTOR COMRAS

Subscribed and sworn to before me

This 25th day of August, 2021.



Notary Public



Corrigendum to Transcript of Deposition of  
Victor Comras

Page 14

Response to question when retained: I was first contacted by Kreindler on or about February 7, 2020. I received and signed the expert consulting letter on or about March 4<sup>th</sup>, 2020.

Page 29 and infra

The correct spelling of Macedonia's capital is Skopje.

Page 61 line 14 should read "with members in those groups."

Page 63 line 3-4 should read " or associated with members of the Muslim Brotherhood."

Page 201 line 11 change "Ayad" to "Wadi al Aqiq."

Page 247 line 21 change "Suez" to Szubin.

Page 311 line 22,23 change "pure claim" to peer acclaim.

Page 336 line 19,20 change "Saudi Arabia President" to Saudi Red Crescent.

Page 345 line 15 change "grow-through" to "go-though."

Page 348 line 3 change "carry out" to "carried out."

Page 406 line 20 change "your" to "our."


Page 423 line 14 change "had" to "add."



Victor Comras

**Subscribed and Sworn to before for**

This 25<sup>th</sup> day of August, 2021.

  
\_\_\_\_\_  
Notary Public

